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Attorneys for
JESUS RODRIGUEZ

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. 2:04-cr-00387-MCE
)	
Plaintiff,)	
)	STIPULATION TO CONTINUE
)	STATUS CONFERENCE FROM
v.)	MAY 31, 2007 TO JULY 19,
)	2007 AT 9:00 A.M. AND EXCLUDE
JESUS RODRIGUEZ,)	TIME UNDER SPEEDY TRIAL ACT
)	
Defendant.)	

IT IS HEREBY STIPULATED AND AGREED between the defendant, Jesus Rodriguez, and the United States of America, through defense counsel, Bruce Locke and Assistant U.S. Attorney Phillip Talbert, that the Status Conference set for May 31, 2007 should be continued to July 19, 2007 at 9:00 a.m. The reason the continuance is that the defense has just received the additional discovery that the government had advised was coming. This discovery relates directly to the defendant's defense of entrapment. The defense will need additional time to review that discovery before the defense will be in a position to advise the Court of how much additional time will be required before the case will be ready for trial. Defense counsel is also in trial in San Francisco from May 25, 2007 to June 15, 2007. The parties agree that the time between May 31, 2007 and July 19, 2007 should be excluded from the Speedy Trial computation for the reason that the additional time is needed for defense preparation. Mr. Talbert has authorized the undersigned to sign this Stipulation and Order for him.

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1 DATED: May 28, 2007

/S/

BRUCE LOCKE
Attorney for Mr. Jesus Rodriguez


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6 DATED: May 28, 2007

/S/ BRUCE LOCKE

for PHILLIP TALBERT
Assistant U.S. Attorney

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11 IT IS SO ORDERED.

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13 Dated: May 30, 2007

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MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE